

April 17, 2017

Scott Smithline, Director
CalRecycle
1001 I Street
Sacramento, CA 95814

Via Email: Scott.Smithline@CalRecycle.ca.gov

**RE: CalRecycle Monthly Public Meeting: Agenda Item 1 - Action Item 2.
Consideration of CARE's Carpet Stewardship Revised Plan 2017-2021**

Dear Director Smithline:

The California Chamber of Commerce joins Carpet America Recovery Effort (CARE) in requesting a 60-day extension with regard to CalRecycle's consideration of the Request for Approval of CARE's Carpet Stewardship Plan 2017-2021 (Plan). Given the significance of the issue, CalChamber believes an extension is prudent to provide CARE and CalRecycle an opportunity to discuss staff's recommendations and the issues raised by the findings.

As indicated in the staff report, "[w]ithout any approved Plans, all manufacturers of carpet are subject to penalties of \$10,000 per day until such time as they are covered by a Department-approved plan." Staff goes on to say wholesalers and retailers will also be subject to similar fines as they would be selling carpet from non-compliant manufacturers (until such time as those manufacturers are covered by an approved plan).

Unfortunately, there is no alternative "approved plan" waiting in the wings to replace the CARE Carpet Stewardship Plan in the event CalRecycle disapproves the plan, nor is there going to be an alternate plan in the foreseeable future as staff points out on Page 17 of the analysis that legislation is needed to "*provide mechanism(s) to minimize disruptions to the recycling infrastructure in the event the stewardship organization ceases program implementation.*"

A decision to disapprove the revised Plan and to commence enforcement action of up to \$10,000 per day against all sellers of carpet in California would cause catastrophic damage to homebuilders, retailers, manufacturers, and consumers. We urge you to give CARE the additional time necessary to work with CalRecycle, and respectfully request that the previous California Carpet Stewardship Plan, as amended by Addendums 1-3, remain in effect for an additional 60 days, pending CARE's work with CalRecycle on an agreeable plan.

If you would like to discuss this matter further, please contact me at Louinda.Lacey@Calchamber.com or 916-930-1260.

Sincerely,



Louinda V. Lacey
Policy Advocate

cc: Faridoon Ferhut, CalRecycle